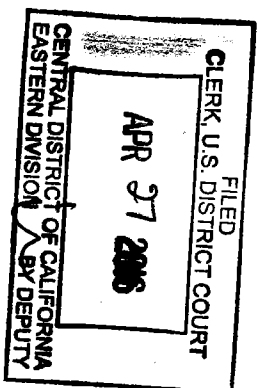


UNDER SEAL

ORIGINAL



EILEEN M. DECKER
United States Attorney

PATRICIA A. DONAHUE

Assistant United States Attorney
Chief, National Security Division

JAY H. ROBINSON (California Bar No. 230015)

MELANIE SARTORIS (California Bar No. 217560)

MIEKE B. TARWATER (California Bar No. 228828)

Assistant United States Attorneys
Terrorism and Export Crimes Section

3403 Tenth Street

Suite 200

Riverside, California 92501

Telephone: (951) 276-6267

(213) 894-5615

(213) 894-0687

Facsimile: (951) 276-6202

(213) 894-7631

E-mail: jay.robinson@usdoj.gov

melanie.sartoris@usdoj.gov

mieke.tarwater@usdoj.gov

Attorneys for Plaintiff

UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

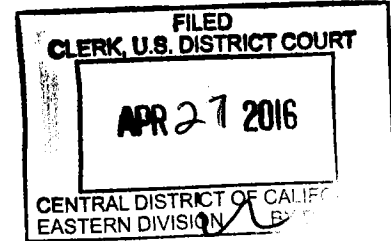
v.

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; DECLARATION OF
JAY H. ROBINSON

(UNDER SEAL)

Defendants.

EILEEN M. DECKER
United States Attorney
PATRICIA A. DONAHUE
Assistant United States Attorney
Chief, National Security Division
JAY H. ROBINSON (California Bar No. 230015)
MELANIE SARTORIS (California Bar No. 217560)
MIEKE B. TARWATER (California Bar No. 228828)
Assistant United States Attorneys
Terrorism and Export Crimes Section
3403 Tenth Street
Suite 200
Riverside, California 92501
Telephone: (951) 276-6267
(213) 894-5615
(213) 894-0687
Facsimile: (951) 276-6202
(213) 894-7631
E-mail: jay.robinson@usdoj.gov
melanie.sartoris@usdoj.gov
mieke.tarwater@usdoj.gov



Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIYA CHERNYKH,
TATIANA FAROOK, and
SYED RAHEEL FAROOK,

Defendants.

No. CR 16- 292

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; DECLARATION OF
JAY H. ROBINSON

(UNDER SEAL)

The government hereby applies ex parte for an order that the indictment and any related documents in the above-titled case (except the arrest warrants for the charged defendants(s)) be kept under seal

///

///

///

1 until the government files a "Report Commencing Criminal Action" in
2 this matter.

3 This ex parte application is made pursuant to Federal Rule of
4 Criminal Procedure 6(e)(4) and is based on the attached declaration
5 of Jay H. Robinson.

6 Dated: April 26, 2016

Respectfully submitted,

7 EILEEN M. DECKER
8 United States Attorney

9 PATRICIA A. DONAHUE
10 Assistant United States Attorney
11 Chief, National Security Division

12 
13 _____

14 JAY H. ROBINSON
15 MELANIE SARTORIS
16 MIEKE B. TARWATER
17 Assistant United States Attorneys

18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA
20
21
22
23
24
25
26
27
28

DECLARATION OF JAY H. ROBINSON

I, Jay H. Robinson, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Mariya Chernykh, Tatiana Farook, and Syed Raheel Farook, the indictment in which is being presented to a federal grand jury in the Central District of California on April 27, 2016.

2. The defendants charged in the above-captioned indictment have not been taken into custody on the charge(s) contained in the indictment and have not been informed that they are being named as defendant(s) in the indictment to be presented to the grand jury on April 27, 2016. The likelihood of apprehending one or more of the charged defendants might jeopardized if the indictment in this case were made publicly available before defendant(s) are taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Riverside, California, on April 26, 2016.


JAY H. ROBINSON